

DOAR RIECK KALEY & MACK
ATTORNEYS AT LAW

JOHN DOAR (1921-2014)
JOHN F. KALEY
WALTER MACK

OF COUNSEL
JOHN JACOB RIECK, JR.
JAMES I. WASSERMAN
DAVID RIVERA
MICHAEL MINNEFOR

ASTOR BUILDING
7TH FLOOR
217 BROADWAY
NEW YORK, N.Y. 10007-2911

TELEPHONE: (212) 619-3730
FACSIMILE: (212) 962-5037
e-mail: firm@doarlaw.com
website: www.doarlaw.com

June 21, 2018

VIA ECF AND EMAIL

Honorable Kimba M. Wood
Senior United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Steven Brown, 16 Cr.436 (KMW)

**Letter Application Seeking The Court's Permission
For Defendant Steven Brown To Travel
To The Brussels Film Festival For Business Purposes**

Dear Judge Wood:

We are writing to request the Court's permission to allow Defendant Steven Brown to travel to Europe for several days, departing the evening of June 22 and returning the evening of June 26th/the morning of June 27th, so that he may attend the Brussels Film Festival.

Mr. Brown seeks to attend this film festival to market and secure foreign distribution of two finished movies on which he served as executive producer, *11:55*, which was released theatrically in the United States last year, and a European film, *Dance Angels*. He would like to meet with the following distributors overseas: SND, M6, First Int Pic Fip, September 7 and TF1. Mr. Brown may also need to travel to Barcelona and Paris during this trip to meet with potential buyers who are not in attendance at the festival. These finished films were created as a result of Mr. Brown's important contributions and professional expertise and he and he alone is the person most identified with, most responsible for, and most qualified to market these films with foreign distributors.

Honorable Kimba M. Wood

-2-

June 21, 2018

Mr. Brown believes he can generate income from the foreign distribution of these movies that he intends to use for several purposes, including (i) to meet his financial obligations to his two nieces, one of whom is commencing college, (ii) to put together a seven-figure restitution payment plan for the victims of his crime, and (iii) to pay his outstanding attorneys' fees to his defense counsel, which are significant, and which continue to mount precipitously as we prepare for sentencing.

Mr. Brown believes this to be his last and best opportunity to address these obligations before he becomes too incapacitated to do so either by un-overcomable restrictions on his freedom to travel and/or by health issues related to his vision.

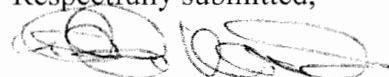
This request is being made close to the proposed date of travel due to the fact Mr. Brown has been unable over the past several weeks to communicate to us the details of this proposed travel request because he has been undergoing numerous medical exams in California. If the Court is unable to rule on this matter until Monday, Mr. Brown can adjust his dates of travel to attend the final days of the film festival, which concludes on Tuesday, and return within three days.

Your Honor has granted Mr. Brown's several previous applications for international travel for business purposes and he has always traveled without incident, always meeting his obligations to his Pretrial Services Officer and the Court. He remains subject to the Court's stringent bail conditions and will report all sales to his Pretrial Services Officer.

The Government has indicated it opposes this request and will submit its position with dispatch.

We thank the Court for its consideration.

Respectfully submitted,



Walter Mack

cc: (via email):AUSA Katherine Reilly
AUSA Noah Solowiejczyk
PTSO Matthew Carter (by email)
Officer Ross Kapitanksy (Probation)